

EXHIBIT A

**STUDIO 1 DIV. of SHAZDEH FASHIONS
1450 Broadway Floor 17 New York NY 10018**

DEMAND FOR RECLAMATION

October 24, 2018

VIA FEDERAL EXPRESS

Sears Holding Corporation
3333 Beverly Road
Hoffman Estates, IL 60179
Attn: Robert A. Riecker, CFO

VIA FEDERAL EXPRESS

Jacqueline Marcus, Esq.
Weil Gotshal & Manges, LLP
767 5th Avenue
New York, NY 10153

*Re: Studio 1 Div. of Shazdeh Fashions (“ST1”) with
Sears, Roebuck and Co. (18-23537)*

Dear Sir/Madam:

Goods have been shipped to Sears Holding Corporation and/or one or more of your affiliates (collectively, the “Debtors”), including, but not limited to, Sears, Roebuck and Co. and/or Kmart Holding Corporation within 45 days before the date of the Chapter 11 filings on October 15, 2018 (the “Filing Date”), represented by the attached schedule.

Pursuant to Section 546(c)(1) of the Bankruptcy Code and Section 2-702 of the Uniform Commercial Code (as applicable and adopted in the State of New York, *N.Y.U.C.C. Law*, §2-702), ST1 hereby exercises all of its rights and remedies thereunder and demands reclamation of all product (“Product”), which is listed on the attached invoices as Exhibit “A” and detailed on Exhibit “B”, also attached hereto. Pursuant to Section 546(c)(1) and 2-702(2) of New York’s Uniform Commercial Code, and by virtue of the Debtor’s insolvency, this letter shall serve as a formal reclamation demand for the Product received by the Debtors from ST1 as set forth on the attached, except to the extent ZG has authorized the Debtors in writing post-petition to utilize specifically identifiable goods, subject to payment of same whether through an allowed claim under § 503(b)(9) of the Bankruptcy Code or otherwise.

The Product subject to this Demand for Reclamation is to be segregated and marked as property of ST1 and is not to be used or sold by the Debtors. ST1 demands immediate access as

necessary in order to identify the Product subject to this Demand for Reclamation. Please contact the undersigned upon receipt of this Demand for Reclamation in order to arrange for the prompt return of the Product subject to this Demand for Reclamation. In the alternative, please arrange for the return of the Product within seven (7) days of the date of this Demand for Reclamation.

This Demand for Reclamation shall not constitute an election of remedies by ST1 nor a waiver of any rights, remedies or claims that ST1 holds under the applicable law (including, but not limited to, the United States Bankruptcy Code), orders of court or agreements with any party, all of which are expressly reserved by ST1.

This reclamation demand is made without prejudice to any other rights or remedies available to ST1, at law or in equity, including, but not limited to, ST1's right to an administrative expense claim under section 503(b)(9) of the Bankruptcy Code for all goods received by the Debtors within 20 days before the Petition Date.

I trust I will hear from you accordingly to discuss the details without having to resort to additional litigation. If I do not hear from you, I will have no alternative but to proceed to protect ST1's rights.

For Studio 1 Div. of Shazdeh Fashions



Richard Silverstein (COO)

STUDIO I DIV OF SHAZDEH FASHIONS

1450 BROADWAY FL 17
NEW YORK , NY 10018 2217 USA
Tel : 212-944-2510 Fax:

Ship To, Store: 8780
KMART RSC #8780
WESTERN REGIONAL SPECIALTY DC
3100 MILLIKIN AVENUE
MIRA LOMA , CA 91752 USA

Bill To , Act #: **SE300**
SEARS, ROEBUCK AND CO.
P.O.BOX 660200
NATIONAL A/P CTR. TIPS PROCESS
DALLAS , TX 75266 USA

Date :08/31/18

Invoice # **367441**

FOB :			
Order #:	08780033886	Ctrl #	29448
Dept #	007	Pick #	35805
Vendor #	01000134171	Slpn	GP1
Terms	4% 30DAYS ROG	Via	GILBERT EXPRESS
Factor Appr	MR.ZAR	Ctns	273
Duns #	056831209	Weight	1882
PRO #		B/L No.	10108297

REMIT TO: SHAZDEH FASHIONS INC
1450 Broadway 17fl
New York, NY 10018

STYLE	COLOR		CUST STYLE	LN	DESCRIPTION		QTY	EA	EXTENSION
71683K	GMU GMU		008822 341	1	1 PC 3/4 SLV DRESS		1,648	18.00	29,664.00
2	4	6	8	10	12	14	16	18	
			206	206	412	412	206	206	
71989K	BAQ BAQ		008822 822	2	1PC 3/4 SLV DRESS		536	18.00	9,648.00
XSM	SML	MED	LRG	XLG	XXL				
	67	134	201	134					

QTY: 2,184	GROSS: 39,312.00	SHIPPING 0.00	HANDLING 0.00	TOTAL: 39,312.00
2839				

NO RETURNS WILL BE ACCEPTED WITHOUT OUR AUTHORIZED RMA # AFFIXED TO PACKAGE Continuing guaranty under the
Flammable Fabric Act and the Textile Products Identification Act Filed with Federal Trade Commission

Page 1 of 1

STUDIO I DIV OF SHAZDEH FASHIONS

1450 BROADWAY FL 17
NEW YORK, NY 10018 2217 USA
Tel : 212-944-2510 Fax:

Ship To, Store: 8781
KMART RSC #8781
NORTHEAST REGIONAL SPECIALTY DC
1475 NITTERHOUSE ROAD
CHAMBERSBURG , PA 17201 USA

Bill To , Act #: SE300
SEARS, ROEBUCK AND CO.
P.O.BOX 660200
NATIONAL A/P CTR. TIPS PROCESS
DALLAS , TX 75266 USA

Date : 08/31/18

Invoice # **367442**

FOB :		Ctrl #	29451
Order #:	08781007829	Pick #	35806
Dept #	007	Slpn	GP1
Vendor #	01000134171	Via	GILBERT EXPRESS
Terms	4% 30DAYS ROG	Ctns	278
Factor Appr	MR.ZAR	Weight	1927.04
Duns #	056831209	B/L No.	10109017
PRO #			

REMIT TO: SHAZDEH FASHIONS INC
1450 Broadway 17fl
New York, NY 10018

STYLE	COLOR		CUST STYLE	LN	DESCRIPTION		QTY	EA	EXTENSION
71683K	GMU GMU		008822 341	1	1 PC 3/4 SLV DRESS		1,616	18.00	29,088.00
	2	4	6	8	10	12	14	16	18
			202	202	404	404	202	202	
71989K	BAQ BAQ		008822 822	2	1PC 3/4 SLV DRESS		608	18.00	10,944.00
	XSM	SML	MED	LRG	XLG	XXL			
		76	152	228	152				

QTY : 2,224	GROSS: 40,032.00	SHIPPING 0.00	HANDLING 0.00	TOTAL: 40,032.00
2840				

STUDIO I DIV OF SHAZDEH FASHIONS

1450 BROADWAY FL 17
NEW YORK , NY 10018 2217 USA
Tel : 212-944-2510 Fax:

Date : 09/12/18

Invoice # 368397

FOB :

Order #:	08780035075	Ctrl #	30046
Dept #	007	Pick #	36124
Vendor #	01000134171	Slpn	GP1
Terms	4% 30DAYS ROG	Via	GILBERT EXPRESS
Factor Appr	MR.ZAR	Ctns	389
Duns #	056831209	Weight	3112
PRO #		B/L No.	10110193

Ship To, Store: 8780
KMART RSC #8780
WESTERN REGIONAL SPECIALTY DC
3100 MILLIKIN AVENUE
MIRA LOMA , CA 91752 USA

Bill To , Act #: SE300
SEARS, ROEBUCK AND CO.
P.O.BOX 660200
NATIONAL A/P CTR. TIPS PROCESS
DALLAS , TX 75266 USA

REMIT TO: SHAZDEH FASHIONS INC
1450 Broadway 17fl
New York, NY 10018

STYLE	COLOR		CUST STYLE		LN		DESCRIPTION		QTY	EA	EXTENSION
71890K	BIU BIVP		008822 398		1		1 PC 3/4 SLV DRESS		1,504	18.00	27,072.00
2	4	6	8	10	12	14	16	18			
		188	188	376	376	188	188				
72069K	WIM WIM		008812 794		2		1PC 3/4 SLV DRESS		1,608	18.00	28,944.00
2	4	6	8	10	12	14	16	18			
		201	201	402	402	201	201				

QTY: 3,112	GROSS: 56,016.00	SHIPPING 0.00	HANDLING 0.00	TOTAL: 56,016.00
2955				

NO RETURNS WILL BE ACCEPTED WITHOUT OUR AUTHORIZED RMA # AFFIXED TO PACKAGE Continuing guaranty under the
Flammable Fabric Act and the Textile Products Identification Act Filed with Federal Trade Commission

Page 1 of 1

STUDIO I DIV OF SHAZDEH FASHIONS

1450 BROADWAY FL 17
NEW YORK , NY 10018 2217 USA
Tel : 212-944-2510 Fax:

Ship To, Store: 8781
KMART RSC #8781
NORTHEAST REGIONAL SPCLTY DC
1475 NITTERHOUSE ROAD
CHAMBERSBURG , PA 17201 USA

Bill To , Act #: SE300
SEARS, ROEBUCK AND CO.
P.O.BOX 660200
NATIONAL A/P CTR. TIPS PROCESS
DALLAS , TX 75266 USA

Date : 09/12/18

Invoice # 368398

FOB :

Order #:	08781009040	Ctrl #	30047
Dept #	007	Pick #	36125
Vendor #	01000134171	Slpn	GP1
Terms	4% 30DAYS ROG	Via	GILBERT EXPRESS
Factor Appr	MR.ZAR	Ctns	403
Duns #	056831209	Weight	3224
PRO #		B/L No.	10110195

REMIT TO: SHAZDEH FASHIONS INC
1450 Broadway 17fl
New York, NY 10018

STYLE	COLOR		CUST STYLE		LN	DESCRIPTION		QTY	EA	EXTENSION
71890K	BIU BIVP		008822 398		1	1 PC 3/4 SLV DRESS		1,568	18.00	28,224.00
2	4	6	8	10		12	14	16	18	
		196	196	392		392	196	196		
72069K		WIM WIM		008812 794		2	1PC 3/4 SLV DRESS		1,656	18.00
2	4	6	8	10		12	14	16	18	
		207	207	414		414	207	207		

QTY : 3,224	GROSS: 58,032.00	SHIPPING 0.00	HANDLING 0.00	TOTAL: 58,032.00
2956				

STUDIO I DIV OF SHAZDEH FASHIONS

1450 BROADWAY FL 17
NEW YORK, NY 10018 2217 USA
Tel: 212-944-2510 Fax:

Ship To, Store: 8780
KMART RSC #8780
WESTERN REGIONAL SPECIALTY DC
3100 MILLIKIN AVENUE
MIRA LOMA, CA 91752 USA

Bill To, Act #: SE300
SEARS, ROEBUCK AND CO.
P.O.BOX 660200
NATIONAL A/P CTR. TIPS PROCESS
DALLAS, TX 75266 USA

Date: 09/30/18

Invoice # 369012

FOB:			
Order #:	08780037051	Ctrl #	31874
Dept #	007	Pick #	37781
Vendor #	01000134171	Slpn	GP1
Terms	4% 30DAYS ROG	Via	GILBERT EXPRESS
Factor Appr	MR. ZAR	Ctns	1165
Duns #	056831209	Weight	3250.56
PRO #		B/L No.	10115799

REMIT TO: SHAZDEH FASHIONS INC
1450 Broadway 17fl
New York, NY 10018

STYLE	COLOR		CUST STYLE		LN	DESCRIPTION		QTY	EA	EXTENSION
71934K	BLI BLIV		009936 674		1	1 PC 3/4 SLV DRESS		960	18.00	17,280.00
2	4	6	8	10	12	14	16	18		
		120	120	240	240	120	120			
96100K	BKI BKIV		009934 057		2	1PC 3/4 SLV DRESS		640	17.50	11,200.00
XSM	SML	MED	LRG	XLG	XXL					
	80	160	240	160						
96215K	IVY IVY		009930 645		3	1 PC L/S DRESS		536	17.50	9,380.00
XSM	SML	MED	LRG	XLG	XXL					
	67	134	201	134						
96215K	RG3 RUBY		009930 681		4	1 PC L/S DRESS		1,344	17.50	23,520.00
XSM	SML	MED	LRG	XLG	XXL					
	168	336	504	336						
96224K	RED RED		009934 170		5	1 PC 3/4 SLV DRESS		424	17.50	7,420.00
XSM	SML	MED	LRG	XLG	XXL					
	53	106	159	106						
96228K	BIV BIV		009930 758		6	1 PC L/S DRESS		1,344	17.50	23,520.00
XSM	SML	MED	LRG	XLG	XXL					
	168	336	504	336						
96228K	HUB HUB		009930 895		7	1 PC L/S DRESS		536	17.50	9,380.00
XSM	SML	MED	LRG	XLG	XXL					
	67	134	201	134						
96239K	BD2 BIVW		009930 719		8	1 PC 3/4 SLV DRESS		424	17.00	7,208.00
XSM	SML	MED	LRG	XLG	XXL					
	53	106	159	106						
96269K	BY2 BS		009934 086		9	1 PC		424	17.50	7,420.00
XSM	SML	MED	LRG	XLG	XXL					
	53	106	159	106						

Continued

STUDIO I DIV OF SHAZDEH FASHIONS

1450 BROADWAY FL 17
NEW YORK , NY 10018 2217 USA
Tel : 212-944-2510 Fax:

Date : 09/30/18

Invoice # 369012

Ship To, Store: 8780
KMART RSC #8780
WESTERN REGIONAL SPECIALTY DC
3100 MILLIKIN AVENUE
MIRA LOMA , CA 91752 USA

Bill To , Act #: SE300
SEARS, ROEBUCK AND CO.
P.O.BOX 660200
NATIONAL A/P CTR. TIPS PROCESS
DALLAS , TX 75266 USA

Order #:	08780037051	Ctrl #	31874
Dept #	007	Pick #	37781
Vendor #	01000134171	Slpn	GP1
Terms	4% 30DAYS ROG	Via	GILBERT EXPRESS
Factor Appr	MR. ZAR	Ctns	1165
Duns #		Weight	3250.56
PRO #		B/L No.	10115799

REMIT TO: SHAZDEH FASHIONS INC
1450 Broadway 17fl
New York, NY 10018

STYLE	COLOR		CUST STYLE	LN	DESCRIPTION	QTY	EA	EXTENSION
96305K	BIW BIWE		009929 550	10	1PC 3/4 SLV DRESS	1,344	15.50	20,832.00
XSM	SML	MED	LRG	XLG	XXL			
	168	336	504	336				
96306K	IBD IBBX		009939 247	11	1PC 3/4 SLV DRESS	1,344	15.00	20,160.00
XSM	SML	MED	LRG	XLG	XXL			
	168	336	504	336				

QTY : 9,320	GROSS: 157,320.00	SHIPPING 0.00	HANDLING 0.00	TOTAL: 157,320.00
3082				

NO RETURNS WILL BE ACCEPTED WITHOUT OUR AUTHORIZED RMA # AFFIXED TO PACKAGE Continuing guaranty under the Flammable Fabric Act and the Textile Products Identification Act Filed with Federal Trade Commission

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Invoice

STUDIO I DIV OF SHAZDEH FASHIONS

1450 BROADWAY FL 17
NEW YORK, NY 10018 2217 USA
Tel: 212-944-2510 Fax:

Ship To, Store: 8781
KMART RSC #8781
NORTHEAST REGIONAL SPECIALTY DC
1475 NITTERHOUSE ROAD
CHAMBERSBURG, PA 17201 USA

Bill To, Act #: SE300
SEARS, ROEBUCK AND CO.
P.O.BOX 660200
NATIONAL A/P CTR. TIPS PROCESS
DALLAS, TX 75266 USA

Date: 09/30/18

Invoice # 369067

FOB :		Ctrl #	31875
Order #:	08781011062	Pick #	37783
Dept #	007	Slpn	GP1
Vendor #	01000134171	Via	GILBERT EXPRESS
Terms	4% 30DAYS ROG	Ctns	944
Factor Appr	MR.ZAR	Weight	2641.44
Duns #	056831209	B/L No.	10116815
PRO #			

REMIT TO: SHAZDEH FASHIONS INC
1450 Broadway 17fl
New York, NY 10018

STYLE	COLOR		CUST STYLE		LN	DESCRIPTION		QTY	EA	EXTENSION
71934K	BLI BLIV		009936 674		1	1 PC 3/4 SLV DRESS		824	18.00	14,832.00
2	4	6	8	10	12	14	16	18		
		103	103	206	206	103	103			
96100K	BKI BKIV		009934 057		2	1PC 3/4 SLV DRESS		560	17.50	9,800.00
XSM	SML	MED	LRG	XLG	XXL					
	70	140	210	140						
96215K	IVY	IVY	009930 645	3	1 PC L/S DRESS		368	17.50	6,440.00	
XSM	SML	MED	LRG	XLG	XXL					
	46	92	138	92						
96215K	RG3	RUBY	009930 681	4	1 PC L/S DRESS		1,056	17.50	18,480.00	
XSM	SML	MED	LRG	XLG	XXL					
	132	264	396	264						
96224K	RED	RED	009934 170	5	1 PC 3/4 SLV DRESS		368	17.50	6,440.00	
XSM	SML	MED	LRG	XLG	XXL					
	46	92	138	92						
96228K	BIV	BIV	009930 758	6	1 PC L/S DRESS		1,056	17.50	18,480.00	
XSM	SML	MED	LRG	XLG	XXL					
	132	264	396	264						
96228K	HUB	HUB	009930 895	7	1 PC L/S DRESS		464	17.50	8,120.00	
XSM	SML	MED	LRG	XLG	XXL					
	58	116	174	116						
96239K	BD2	BIVW	009930 719	8	1 PC 3/4 SLV DRESS		376	17.00	6,392.00	
XSM	SML	MED	LRG	XLG	XXL					
	47	94	141	94						
96269K	BY2	BS	009934 086	9	1 PC		368	17.50	6,440.00	
XSM	SML	MED	LRG	XLG	XXL					
	46	92	138	92						

Continued

STUDIO I DIV OF SHAZDEH FASHIONS

1450 BROADWAY FL 17
NEW YORK, NY 10018 2217 USA
Tel : 212-944-2510 Fax:

Date: 09/30/18

Invoice # 369067

Ship To, Store: 8781
KMART RSC #8781
NORTHEAST REGIONAL SPECIALTY DC
1475 NITTERHOUSE ROAD
CHAMBERSBURG, PA 17201 USA

Order #:	08781011062	Ctrl #:	31875
Dept #:	007	Pick #:	37783
Vendor #:	01000134171	Slpn:	GP1
Terms:	4% 30DAYS ROG	Via:	GILBERT EXPRESS
Factor Appr:	MR.ZAR	Ctns:	944
Duns #:		Weight:	2641.44

Bill To, Act #: SE300
SEARS, ROEBUCK AND CO.
P.O.BOX 660200
NATIONAL A/P CTR. TIPS PROCESS
DALLAS, TX 75266 USA

REMIT TO: SHAZDEH FASHIONS INC
1450 Broadway 17fl
New York, NY 10018

STYLE	COLOR		CUST STYLE	LN	DESCRIPTION	QTY	EA	EXTENSION
96305K	BIW BIWE		009929 550	10	1PC 3/4 SLV DRESS	1,056	15.50	16,368.00
XSM	SML	MED	LRG	XLG	XXL			
	132	264	396	264				
96306K	IBD IBBX		009939 247	11	1PC 3/4 SLV DRESS	1,056	15.00	15,840.00
XSM	SML	MED	LRG	XLG	XXL			
	132	264	396	264				

QTY: 7,552	GROSS: 127,632.00	SHIPPING 0.00	HANDLING 0.00	TOTAL: 127,632.00
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3098
NO RETURNS WILL BE ACCEPTED WITHOUT OUR AUTHORIZED RMA # AFFIXED TO PACKAGE Continuing guaranty under the
Flammable Fabric Act and the Textile Products Identification Act Filed with Federal Trade Commission

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Studio - Sears

Open invoice's as of October 22, 2018

Terms: 4% 30 Days ROG

State	Invoice	Inv. Date	Po #	Amount	Paid	Balance	Due Date	Rec'd
CA	367441	8/31/2018	8780033886	\$39,312.00	\$0.00	\$39,312.00	10/12/2018	9/17/2018
PA	367442	8/31/2018	8781007829	\$40,032.00	\$0.00	\$40,032.00	10/10/2018	9/11/2018
CA	368397	9/12/2018	8780035075	\$56,016.00	\$0.00	\$56,016.00	10/22/2018	9/27/2018
PA	368398	9/12/2018	8781009040	\$58,032.00	\$0.00	\$58,032.00	10/18/2018	9/18/2018
CA	369012	9/30/2018	8780037051	\$157,320.00	\$0.00	\$157,320.00		
PA	369067	9/30/2018	8781011062	\$127,632.00	\$0.00	\$127,632.00		
				\$478,344.00	\$0.00	\$478,344.00		